

From: [Irizarry, Gilberto](#)
To: [Michaud, John](#); [Tulis, Dana](#); [Averback, Jonathan](#); [Stanton, Larry](#)
Cc: [Rimer, Kelly](#); [Hirtz, James](#); [Salo, Earl](#); [Lynch, Mary-Kay](#); [Schmidt, Lorie](#); [Corman, Bicky](#); [Jennings, Kim](#); [Belke, Jim](#); [Matthiessen, Craig](#)
Subject: RE: Contacts on CAA 112(b) listing of polyglycol Ether
Date: Wednesday, January 22, 2014 2:58:52 PM

Thanks John I do not recall getting the message from Karen that you refer to below. Can you share it ? Also, did you circle back with her with your details below ?

Gilberto "Tito" Irizarry, Director
Program Operations & Coordination Division
Office of Emergency Management
U.S. Environmental Protection Agency
O: 202-564-7982
C: 202-821-8138

From: Michaud, John
Sent: Wednesday, January 22, 2014 2:51 PM
To: Michaud, John; Irizarry, Gilberto; Tulis, Dana; Averback, Jonathan; Stanton, Larry
Cc: Rimer, Kelly; Hirtz, James; Salo, Earl; Lynch, Mary-Kay; Schmidt, Lorie; Corman, Bicky; Jennings, Kim; Belke, Jim; Matthiessen, Craig
Subject: RE: Contacts on CAA 112(b) listing of polyglycol Ether
Apologies for the blank email!

Here is what I wanted to include:

Tito –

[REDACTED]

Thanks.

John R. Michaud
Deputy Associate General Counsel
Solid Waste and Emergency Response Law Office
Office of General Counsel
202-564-5518
michaud.john@epa.gov

From: Michaud, John
Sent: Wednesday, January 22, 2014 2:48 PM
To: Irizarry, Gilberto; Tulis, Dana; Averback, Jonathan; Stanton, Larry
Cc: Rimer, Kelly; Hirtz, James; Salo, Earl; Lynch, Mary-Kay; Schmidt, Lorie; Corman, Bicky; Jennings, Kim; Belke, Jim; Matthiessen, Craig
Subject: RE: Contacts on CAA 112(b) listing of polyglycol Ether
Tito –

John R. Michaud
Deputy Associate General Counsel
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From: Irizarry, Gilberto
Sent: Wednesday, January 22, 2014 1:01 PM
To: Tulis, Dana; Averback, Jonathan; Stanton, Larry
Cc: Rimer, Kelly; Hirtz, James; Salo, Earl; Lynch, Mary-Kay; Michaud, John; Schmidt, Lorie; Corman, Bicky; Jennings, Kim; Belke, Jim; Matthiessen, Craig
Subject: RE: Contacts on CAA 112(b) listing of polyglycol Ether
Another follow-up Here's what the HQ EOC WO has obtained from Region 3.

Thanks,

Gilberto "Tito" Irizarry, Director

Program Operations & Coordination Division
Office of Emergency Management
U.S. Environmental Protection Agency
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From HQ EOC Wednesday, January 22nd, 12:36 pm

Here is information you requested from Region regarding the PPH, which was a mixture of two Dow products. One of the Dow Products is the Propylene Glycol Phenyl Ether with CAS 770-35-4. The other Dow product used in the PPH mixture has a mixture of three glycol ethers, one of which is CAS 770-35-4. The other two are Dipropylene glycol phenyl ether CAS 51730-94-0 and Polypropylene glycol phenyl ether, CAS 28212-40-0.

From: Irizarry, Gilberto

Sent: Wednesday, January 22, 2014 11:41 AM

To: Tulis, Dana; Averbach, Jonathan; Stanton, Larry

Cc: Rimer, Kelly; Hirtz, James; Salo, Earl; Lynch, Mary-Kay; Michaud, John; Schmidt, Lorie; Corman, Bicky; Jennings, Kim; Belke, Jim; Matthiessen, Craig

Subject: RE: Contacts on CAA 112(b) listing of polyglycol Ether
Quick follow-up

Last night, our WO conducted a bit of research on this material and located an MSDS from Dow and identified a CAS No. See below the information located by the HQ EOC WO last night. Still, I've asked the EOC WO to reach out to R3 to have them verify the CAS number and ask if they've obtained an MSDS from the company specific to the product used in this facility .

Will pass on any information obtained.

Gilberto "Tito" Irizarry, Director

Program Operations & Coordination Division

Office of Emergency Management

U.S. Environmental Protection Agency

O: 202-564-7982

C: 202-821-8138

From HQ EOC WO on Tuesday, January 21st:

I did a search on PPH and came across technical data sheet and MSDS from Dow who has a product called Dowanol PPH, propylene Glycol Phenyl Ether, CAS Registry No. 770-35-4. I did not find it specifically on any of EPA's regulatory list when I did a search by CAS No. in the EPA Substance Registry Services (www.epa.gov/srs). There is a chemical category called glycol ethers listed on both the CAA Section 112B list and the EPCRA Section 313 Toxic Release Inventory list. The category is defined by those chemicals meeting a particular chemical formula or structure but it only includes "glycol ethers derived from ethylene glycol, diethylene glycol, and triethylene glycol. This category does NOT contain glycol ethers based on propylene glycol, dipropylene glycol, or tripropylene glycol." The TRI and CAA 112 glycol ether formula definition are the same. Propylene Glycol Phenyl Ether is a glycol ether derived from propylene glycol, so it is NOT included in the listed category of glycol ethers regulated. I used to work in the TRI program so I am familiar with the chemical list.

<http://www.wvgazette.com/News/201401210072?page=1>

Dowanol PPH MSDS <http://www.dow.com/webapps/msds/ShowPDF.aspx?id=090003e8803d20e7>

Other Technical data on Dowanol PPH

http://www.dow.com/assets/attachments/business/pcm/dowanol/dowanol_pph/tds/dowanol_pph_glycol_ether.pdf

[http://msdssearch.dow.com/PublishedLiteratureDOWCOM/dh_0119/0901b80380119ff3.pdf?](http://msdssearch.dow.com/PublishedLiteratureDOWCOM/dh_0119/0901b80380119ff3.pdf?filepath=productsafety/pdfs/noreg/233-00405.pdf&fromPage=GetDoc)

[filepath=productsafety/pdfs/noreg/233-00405.pdf&fromPage=GetDoc](http://msdssearch.dow.com/PublishedLiteratureDOWCOM/dh_0119/0901b80380119ff3.pdf?filepath=productsafety/pdfs/noreg/233-00405.pdf&fromPage=GetDoc)

TRI Glycol Ethers Category

<http://www2.epa.gov/sites/production/files/documents/2000glycol.pdf>

For you chemists in the group:

The glycol ethers category is defined by the following formula:

$R - (OCH_2CH_2)_n - OR'$

where:

$n = 1, 2, \text{ or } 3;$

$R = \text{Alkyl C7 or less, or phenyl or alkyl substituted phenyl};$

$R' = H \text{ or alkyl C7 or less, or}$

OR' consisting of a carboxylic acid ester, sulfate, phosphate, nitrate, or sulfonate.

From: Tulis, Dana

Sent: Wednesday, January 22, 2014 11:11 AM

To: Averback, Jonathan; Stanton, Larry; Irizarry, Gilberto

Cc: Rimer, Kelly; Hirtz, James; Salo, Earl; Lynch, Mary-Kay; Michaud, John; Schmidt, Lorie; Corman, Bicky; Jennings, Kim; Belke, Jim; Matthiessen, Craig

Subject: RE: Contacts on CAA 112(b) listing of polyglycol Ether

Thanks Jon, adding in our regulatory folks.

From: Averback, Jonathan

Sent: Wednesday, January 22, 2014 10:59 AM

To: Stanton, Larry; Irizarry, Gilberto; Tulis, Dana

Cc: Rimer, Kelly; Hirtz, James; Salo, Earl; Lynch, Mary-Kay; Michaud, John; Schmidt, Lorie; Corman, Bicky

Subject: Contacts on CAA 112(b) listing of polyglycol Ether

Larry / Tito / Dana

Bicky Corman passed onto me some of the emails from yesterday asking about the regulatory status of the polyglycol ethers that were released from Freedom Industries. To the extent that the CERCLA coverage would be triggered by the CAA 112(b) hazardous air pollutant (HAP) listing of glycol ethers, then you may want to bring in Jim Hirtz and Kelly Rimer from OAR / OAQPS to interpret that listing. I've copied them on this email. I spoke to Kelly and Jim earlier this AM, and they said the MSDS and the CAS number would be helpful. I don't think I need to be in the loop on technical matters, but if you need a CAA 112(b) lawyer, I can cover that aspect. The rest would be Mary-Kay, John, and Earl.

From what I've seen, I don't see this as adding anything to GDC.

jon